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July 3, 2025

VIA ECF

Hon. Judge Philip M. Halpern
United States District Judge
Southern District of New York
United States Courthouse
300 Quarropas Street, Courtroom Room 520
White Plains, New York 10601-4150

Re: Kristin Stein v. Town of Greenburgh, et al. 21-cv-05673 (PMH)

Dear Judge Halpern:

We represent the Plaintiff, Kristen Stein. We write to request that your Honor assign this case to a Magistrate Judge for mediation. On May 13, 2025, well before the parties submitted their respective motions in limine, we sent a very reasonable demand to defendants' counsel, and at the same time offered the option of mediation either through a jointly agreed upon private mediator or, in the alternative, a joint request to your Honor to have this case mediated before a Magistrate Judge. Several weeks later, still prior to the submission of the parties motions in limine, I received a call from Mr. John Flannery, counsel to defendants, telling me that at that juncture, the defendants would not agree to said requests.

We believe that now that all pretrial motions have been submitted, and a pretrial conference has been scheduled for August 27, 2025, it is an ideal time to explore a mediated resolution to this case. It would be an unfortunate waste of this Court's valuable resources to have this case proceed to a lengthy trial, and subsequent appeals when given the remaining

causes of action and proofs available to both sides a mediated resolution is preferable and available.

Respectfully Submitted



James F. Castro-Blanco

cc: Counsel of Record (via ECF)